

INVISTA Inc.
3 Little Falls
2801 Centerville Rd.
Wilmington, DE 19808



August 11, 2006

The Honorable Charles Grassley
Chairman, Senate Finance Committee
Senate Finance Committee
SD-219
U.S. Senate
Washington, DC 20510

Re: S. 3161 to temporarily suspend the duty on certain sebacic acid, used as a corrosion inhibitor in engine coolants

Dear Mr. Chairman:

INVISTA domestically manufactures products which are direct substitutes and competitors to imported sebacic acid, used as corrosion inhibitors in engine coolants, and we **strongly object to S. 3161** which would temporarily suspend the duty on imports classified under HTS 2917.13.00.30.

INVISTA is one of the world's largest chemical intermediates, polymer, and man-made fiber companies, producing and marketing to the chemical, apparel, automotive, industrial fiber, interiors, and resins industries. It is recognized across the globe through its well-known brands and trademarks including: LYCRA®, STAINMASTER®, ANTRON®, and COOLMAX®. INVISTA is a wholly owned, but independently managed, subsidiary of Koch Industries, Inc., based in Wichita, Kansas.

Sebacic acid is a ten carbon dibasic acid. INVISTA produces two interchangeable dibasic acid offerings that are sold into the same end uses. Our products are Corfree®M1, which is a mixture of sebacic acid, undecanedioic acid, and dodecanedioic acid (ten, eleven, and twelve carbon diacids), and Corfree®M2, which is high purity dodecanedioic acid or DDDA. All of these products may be used for corrosion protection in synthetic metal working fluids, aqueous hydraulic fluids, and in extended life engine coolants. Sebacic acid, Corfree®M1, or DDDA are reacted with either amines, potassium hydroxide, or sodium hydroxide to make salts that are then added to formulations to inhibit corrosion or rust.

Corfree®M1 and Corfree®M2 are both produced at our Victoria, Texas manufacturing plant, and we have ample supply available. Duty free treatment for imports will seriously damage our domestic business.

We also do not believe this bill meets the criteria of being under the maximum threshold of \$500,000 in duties generated per year. In 2005, duties in the amount of \$634,000 were collected.

This year, over 90% of the imports have come from the People's Republic of China. U.S. exports to China of equivalent products would not enjoy reciprocal benefits and today are assessed a 6% import duty plus Value Added Tax.

S. 3161 clearly does not meet the qualifying criteria for the Miscellaneous Tariff Bill, and we urge that it be removed from the final package.

Sincerely,

A handwritten signature in dark ink, appearing to read "Mary K. Vane", with a stylized, cursive script.

Mary Vane
Director, International Trade & Business Development
INVISTA
Phone: 302-683-3230
FAX: 302-683-3495
E-mail: mary.vane@invista.com

